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March 23, 2022

BY ELECTRONIC FILING

Hon. John G. Koeltl, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 APPLICATION GRANTED

SO ORDERED

122

Re:

Jackson v. Madison Security Group Inc.

Case No. 1:21-CV-08721 (JGK)

Dear Judge Koeltl:

This firm represents defendant Madison Security Group Inc. ("<u>Madison</u>" or "<u>Defendant</u>") in the referenced class action (the "<u>Action</u>") commenced plaintiff by Antony Jackson ("<u>Plaintiff</u>"). This letter is respectfully submitted pursuant to the Court's individual practices to request a brief adjournment of the briefing schedule for Defendant's upcoming Motion to Dismiss (the "<u>Motion</u>").

As provided in the Court's scheduling order dated February 18, 2022, Defendant is currently required to file its Motion on or before March 28, 2022, with Plaintiff to file opposition documents on or before April 29, 2022 and Defendant to file reply documents on or before May 13, 2022. To accommodate the responsible attorney for Defendant, who is unexpectedly out of the office due to illness, Defendant respectfully requests that each of the aforementioned briefing deadlines be extended by one (1) week – with the Motion to be filed on or before April 4, 2022, opposition documents to be filed on or before May 6, 2022, and reply documents to be filed on or before May 20, 2022. Counsel for Plaintiff has consented to this request. Further, no prior request for such an extension has been made by any party to the Action.

Thank you for your attention to this matter.

Respectfully,

/s/ Joseph P. Cervini Joseph P. Cervini, Jr.

cc (via ECF):

Fitapelli & Schaffer, LLP 28 Liberty Street New York, New York 10005 Attn: Frank Mazzaferro and Brian Schaffer